NYSCEF DOC. NO. 106

INDEX NO. 159991/2018

RECEIVED NYSCEF: 03/22/2019

	Ginarte LAW Firm 233 Broadway NY, NY October 26, 2018
	I am AT the Ginarte
	Law firm located at 233 Broadway
	N.Y. My giving this statement or my
	own free will to Michael Malone
	a Private in vestigator with Sage Intelligence.
	I have worked for about 3 years
	at William Schwitzer & Associates.
	I along with other staff members of the
	firm was encouraged to attend I.M.E
	and Doctor appointments with dients of the
	law firm. During these appointments I along
	with other employee's would ask other patients
	if they were happy with thier present
<del> </del>	attorney. My goal was if it was a good
and the state of t	Case I would can MR. sohwitzer explain
t-	the case and persuade the patient to
	come to our office with me now and provide
	them with transportation to MR. Schwitzer's office.
	The Patient would meet MR Schwitzer and
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	an agreement was worked our between
	them. If the patient now elient would
	need cash MR. Schwitzer Would Send them
	to Case cash located at 520 8th Ave,
	NY, NY 10th Floor to recieve a top look
	for the case. Is managed by
	on attorney but may be

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	owned by MR. Schwitzer homself. MR. Schwitzer
	her abour 30 to 35 Para legal working for
	his firm. Every pare legal hed bussmers
	cords to have out to patients who
	could be potentian chairs.
***************************************	Mr. Schwitzer also employ's runners
	that would go to accident scenes.
	and sign up alients As well.
	one of these runners is
	who would sign clients up so
	either the hospital, accident scenes or
	Ductor appointments.
	I once had a runner can me up
n James J	and asked me for money up for a case
	that was yet to be signed up or brought
	into the firm. I Forwarded this can
	to John Merlino who is Mr. Schwitzers
hydragen - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	Partner.
	At some of these doctors appointment
	we would talk to the client AND inquire.
	who how they got to doctor's appointment
· · · · · · · · · · · · · · · · · · ·	if the told us Public transportation we
	would tell them we would provide an ober
	for appointments. Use would also say
·····	we were heard it that attorney
	and tell them we are a top 5
	Jawform AND insure then we would get

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	gricker workman's compersation Payments
الراحي المستجودين	through is but world have to
S	retain our law firm as representation
· · · · · · · · · · · · · · · · · · ·	for the law suit. We would try to
	streeten the deal and point out what
<u> </u>	thier Present attorney was lacking.
\$240,000,000,000,000,000,000,000,000	we would target or push for cases
	that would reap a large settlement.
	I remember one construction case
d general construction and advantage on a con-	the gras 1st name was who lived
***************************************	upstate was already retained by Joe Ginarte
	Firm in 2017. There was like A tog of war
	over which from he should use and
to the second	he switched to schwitzer because he
-,,,,,,	recreved five thousand dollars up front.
	I AM AWORE THAT JOE GINDRIE AND
	William Schwirzer use the same Doctor
	so there might be some
	attorney switching going or at these
	doctor appointments involving William Schwitzers
**************	staff of Porolegals. William Schwitzer
	also uses runners in all 5 Boroughs
	and I am fomilian with
**************************************	from stater Island who brings in labor law
	cases. In the past selwitzer has accused me
THE AND DE AUGUSTUS CONTRACTOR	of steading clients and threateness me with
1919 To The Control of the Control o	bodid bodily harm. This was in october of

RECEIVED NYSCEF: 03/22/2019 NYSCEF DOC. 2015. I have also observed him threaten other employees of his firm. I stopped working for Mr. Schwitzer in may of 2018. I would also like to add that he Keeps a book case in his office with a of cosh and he uses large amount this cash to pay both clients and the war runners. By he I mean MR. Schwitzer uses this cash to bring these cases to his firm. I have read this four page statement that I have given Michael Malone or my own and swear it is All true. 10-26-18 GISELLE VELEZ NOTARY PUBLIC-STATE OF NEW YORK No. 01VE6256653 Qualified in New York County My Commission Expires March 05, 20.26

COUNTY CLERK 03/22/2019 05:36 PM

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